

November 4, 2016

VIA FACSIMILE AND CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Mr. Seth Draper
U.S. Environmental Protection Agency – Region 7
Water, Wetlands and Pesticides Division
11201 Renner Boulevard
Lenexa, Kansas 66219

RE: Saint Louis Composting, Inc.
Response to Valley Park Facility's *Compliance Verification Report* by SCS Engineers
dated October 2016

Dear Mr. Seth Draper:

St. Louis Composting, Inc. (SLC) received a copy of the Compliance Verification Report (Report) dated October 2016 from SCS Engineers (SCS) relating to SLC's Valley Park Facility (Facility) located at 39 Old Elam Avenue in Valley Park, Missouri. The contents of this document respond to the observations and recommendations (*italicized and in bold print*) provided by SCS in the Facility's Report. SLC's responses to the Report's observations and recommendations are written directly below the Report's quote.

- 1. Section 2.2 #1: "Observation: AST locations at Facility do not match up with SWPPP figure. Recommendation: Update AST locations in the new SWPPP and SPCC Plan."***

SLC Response: Appendix A has an updated figure that includes the AST locations as well as Section 4.2 referencing the AST locations. Appendix B shows the draft SWPPP revision which includes the AST locations in Section 4.2. The AST locations and text referencing the AST locations have also been updated in Appendix B's draft SPCC revision.

- 2. Section 2.2 #2: "Observation: Outfall #002 is marked at the Facility, but not on the site figure or in the Facility's NPDES permit provided at inspection. Recommendation: Correct the SWPPP and signage so outfall information is correct and consistent in all site-related documents."***

SLC Response: The location of Outfall #002 has been labeled on an updated SWPPP figure in Appendix A.



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3. ***Section 2.2 #3: “Observation: Damaged filter socks were noted. Recommendation: Replace damaged filter socks.”***

SLC Response: The damaged filter socks observed near the southwest corner of the facility have been replaced with new filter socks. Please view photograph number 1 and 2 in Appendix C’s Photograph Log.

4. ***Section 2.2 #4: “Observation: Buildings not labeled in the same fashion as indicated on the SWPPP. Recommendation: For ease of inspection and site identification label all buildings in a clear manner.”***

SLC Response: Signage has been installed on storage lockers #1, #2, #3, and #4 as well as the lubricating station. Please view photograph numbers 3, 4, 5, 6, and 7 in Appendix C’s Photograph Log.

5. ***Section 2.2 #5: “Observation: AST fuel nozzles not properly stored. Recommendation: Train all staff to properly replace fuel nozzles in proper receptacles when not in use.”***

SLC Response: SLC employees have been trained in proper fueling procedures which includes fuel nozzle placement after fueling procedures are completed. A copy of the training is documented in Appendix D’s Toolbox Talk Sign-In Sheet and email.

6. ***Section 2.2 #6: “Observation: Trash receptacles open to storm water. Recommendation: Provide lids for onsite trash receptacles.”***

SLC Response: The trash receptacles contain non-putrescible waste that is properly disposed of in a timely manner by a disposal and/or recycling company. Therefore, SLC feels that there is no harm to keep the trash receptacles containing non-putrescible without lids.

7. ***Section 2.2 #7: “Observation: Storm water retention pond in northwest corner not shown on figure. Recommendation: Include the new storm water retention pond on the SWPPP figure.”***

SLC Response: The new storm water retention pond in the northwest corner is now shown on the revised draft SWPPP figure which is attached as Appendix A.

8. ***Section 2.2 #8: “Observation: An appropriately calibrated meter for measuring temperature and pH is not used during sample collection (SWPPP, Section 5.8).***



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Recommendation: None. Client is researching appropriate meters. Following identification and purchase, use meter to measure pH and temperature during sample collection."

SLC Response: SLC has voluntarily chosen to replace Section 3.8 page 11, which SCS has called Section 5.8, of Valley Park's 2009 SWPPP with a revised draft SWPPP. SLC's stormwater sampling procedures have been modified to reflect requirements of the permit. Please view Section 5.8 in the draft SWPPP revision in Appendix A for details.

9. Section 3.1: "Verification Item: General DMRs. Observation or Recommendation: Paper copies should be kept on site for a period of three years."

SLC Response: SLC has moved all 2013 through third quarter 2016 DMRs to the site in a labeled binder.

10. Section 3.1: "Verification Item: 2015 DMR. Observation or Recommendation: No record of first quarter DMR. If this DMR was submitted to the MDNR, it should be maintained on site. Records present for the remaining quarters showing "no discharge"'"

SLC Response: SLC cannot locate a physical or electronic copy of first quarter 2015 DMR that was submitted to the Missouri Department of Natural Resources (MDNR). It is believed that a former SLC employee who created and was responsible for the original first quarter 2015 DMR failed to retain copies of the DMR submittal. SLC submitted a copy of the first quarter 2015 DMR to MDNR prior to the required submittal due date.

11. Section 3.1: "Verification Item: 2016 DMR. Observation or Recommendation: First quarter DMR shows "no discharge" A revised DMR was provided with the first quarter DMR noting that the report was submitted in a new format. Suggest the original submittal be maintained on site with the revised DMR. No record of the second quarter DMR. If this DMR was submitted to the MDNR, it should be maintained on site. No record of the third quarter DMR. If this DMR was submitted to the MDNR, it should be maintained on site."

SLC Response: The second quarter 2016 DMR was available for review. The third quarter 2016 DMR was not present on site because the audit review date for the Valley Park facility was October 4, 2016 and conducted prior to the third quarter 2016 October due date. Regardless, please review Appendix E for copies of the second and third quarter 2016 DMRs.

12. Section 3.2: "Verification Item: 2014 Annual Report. Observation or Recommendation: Report is not dated but meets the NPDES criteria. Recommend that STLC maintain dated copy in the file."

SLC Response: The original 2014 Annual Report for Valley Park was submitted without a date. SLC is not altering the original copy of the 2014 Annual Report by adding a date. The original electronic copy of the 2014 Annual Report contains the same title in the file name and the physical site copy of the 2014 Annual Report is contained beneath a "2014 Annual Report" tab to avoid any potential confusion.

13. Section 3.3: "Verification Item (General Reports): #1. Observation or Recommendation: Only reports provided were from January 2016 to present; dedicated to the SWPPP. Records from 2014 and 2015 combined safety sheets as well as SWPPP items. STLC should maintain SWPPP inspection forms separate of site safety forms."

SLC Response: All General Reports prior to 2016 are saved in a separate binder labeled "Archives". All current year's General Reports are saved under that year in a binder. In this case, we have a separate 2016 General Reports binder. In 2017, all 2016 General Reports will be moved to the Archives binder.

14. Section 3.3: "Verification Item (General Reports): #2. Observation or Recommendation: Some forms are signed illegibly by the individual who performed the inspection. All inspectors should print their name as well as initial or sign each inspection form."

SLC Response: The General Reports from the SWPPP are already printed in the Facility Manager's name. There are instances, such as times when a Facility Manager takes vacation, where the Facility Manager would have another site inspector perform the required General Reports. SLC's common practice would be for the Site Inspector to cross out the Facility Manager's name and print their own name on the General Reports. Please note that all Site Inspectors as well as Facility Managers are trained in the site specific SWPPPs. We have included a revision in our common practice to have the Site Inspector to print and sign or initial the General Forms.

15. Section 3.3: "Verification Item (General Reports): #3. Observation or Recommendation: The inspection records provide adequate information to meet the requirements of the permit. Notes should indicate schedule for corrective actions and when they are complete."

SLC Response: It is difficult in our company operations to predict exactly when corrective action(s) can/will take places due to our everchanging facility resources, which includes both equipment and labor. There are times when employees and equipment need to be scheduled and brought out from one of our other facilities to complete certain tasks. It is common practice to say a task will be completed and an update on the task given within a week from the original date of reporting.

16. Section 3.3: “Verification Item (General Reports): #4. Observation or Recommendation: As the inspection records continue to accumulate, they should be moved to a separate binder and maintained with the SWPPP.”

SLC Response: General Reports are already bound in separate labeled binders and maintained with the SWPPP on site.

17. Section 3.4: “Verification Item (General Training Forms): #1. Observation or Recommendation: Not all individuals who filled out weekly inspection forms are listed on the training form.”

SLC Response: Many employees fluctuate to multiple facilities to perform job related tasks, wherever they are needed. Therefore, some employees have been trained with SWPPP, SPCC, and spill kit usage under other and/or multiple facilities. New hires are currently trained for SWPPP, SPCC, and spill kit usage at their facilities. Facility managers show where the documents and spill kits are located on site. To avoid any potential confusion in the future, SLC plans to inform all current and new employees of all SWPPP, SPCC, and spill kit usage during an annual “all hands meeting” training where facility specific information will be given to all attending employees. This will be a yearly event.

18. Section 3.4: “Verification Item (General Training Forms): #2. Observation or Recommendation: From NPDES Permit – All individuals involved in material handling, storage, and housekeeping areas containing materials exposed to storm water are required to have sufficient training. Individuals involved in the inspection of the Facility or Facility Maintenance need to sign the training sheet to confirm they have received proper training.”

SLC Response: Many employees fluctuate to multiple facilities to perform job related tasks, wherever they are needed. Therefore, some employees have been trained with SWPPP, SPCC, and spill kit usage under other and/or multiple facilities. New hires are currently trained for SWPPP, SPCC, and spill kit usage at their facilities. Facility managers show where the documents and spill kits are located on site. To avoid any potential confusion in the future, SLC plans to inform all current and new employees

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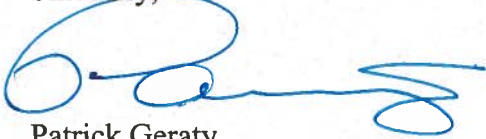
19. Section 3.4: “Verification Item (General Training Forms): #3. Observation or Recommendation: Only training records provided were for 2016. STLC should maintain all training records for a minimum of three years.”

SLC Response: SLC will keep all training records on file.

Please note that any SLC responses that have included SWPPP revisions are documented in the Amendment Schedule of Appendix F. Any SLC responses that have included SPCC revisions are documented in the Amendment Schedule of Appendix G.

If you have any questions regarding the enclosed information, please contact me at 636-861-3344 or at pgeraty@stlcompost.com.

Sincerely,



Patrick Geraty
President

Enc.